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MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

07 C 6464

Plaintiff,

VS.

Defendant.

JUDGE PALLMEYER
MAGISTRATE JUDGE VALDEZ

INTRODUCTION

VENUE AND JURISDICTION

3. Venue and personal jurisdiction in this District are proper because:

b. Defendant transacts business within this District.

4. Plaintiff Anna-Katrina S. Christakis is an individual who resides in the Northern District of Illinois.

5. Defendant Allied Collection Services, Inc. is a Nevada corporation. Its registered agent and office are Michael L. Feeney, 3080 S. Durango Dr., Ste. 208, Las Vegas, Nevada 89117.

6. Allied Collection Services, Inc. operates a collection agency and is engaged in the business of using the mails and telephone to collect consumer debts originally owed to others.

7. Allied Collection Services, Inc. is a debt collector as defined in the FDCPA.

FACTS

8. Allied Collection Services, Inc. has been attempting to collect from plaintiff Anna-Katrina S. Christakis a purported debt incurred for personal, family, or household purposes. The debt is not owed.

9. On April 4, 2006 and again on July 2, 2007, plaintiff sent defendant letters informing it that she would not pay the purported debt and demanding cessation of further contact.

10. On multiple occasions during June-September 2007 plaintiff received telephone calls from defendant seeking to collect the debt.

VIOLATIONS COMPLAINED OF

11. Defendant thereby violated 15 U.S.C. §1692c.

WHEREFORE, the Court should enter judgment in favor of plaintiff and against defendant for:

- (1) Statutory damages;
- (2) Attorney's fees, litigation expenses and costs of suit;
- (3) Such other and further relief as the Court deems proper.

s/Daniel A. Edelman
Daniel A. Edelman

Daniel A. Edelman
Cathleen M. Combs
James O. Lattuner
Francis R. Greene
EDELMAN, COMBS, LATTURNER
& GOODWIN, L.L.C.

120 S. LaSalle Street, 18th Floor
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JURY DEMAND

Plaintiff demands trial by jury.

s/Daniel A. Edelman
Daniel A. Edelman

NOTICE OF LIEN

Please be advised that we claim a lien upon any recovery herein for 1/3 or such amount as a court awards.

s/Daniel A. Edelman
Daniel A. Edelman

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